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Attorneys for DEFENDANTS:
HUMANITY FOR HORSES and CARLOS RUBIO

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

JERRY FUENTES, an Individual,

Plaintiff,

v.

HUMANITY FOR HORSES, a California
Non-Profit Corporation; CLAUDIO RUBIO,
an Individual, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO. 2:21-CV-02350-JAM-AC

**STIPULATION AND ORDER RE:
FILING OF SECOND AMENDED
COMPLAINT AND TIME FOR
DEFENDANTS TO FILE RESPONSIVE
PLEADING**

Superior Cmplt. Filed: November 5, 2021
Removed: December 17, 2021
Trial Date: November 27, 2023

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff JERRY FUENTES (“Plaintiff”) and Defendants HUMANITY FOR HORSES and CARLOS RUBIO (“Defendants”), by and through their attorneys of record, and pursuant to Local Rules 137, 143, and 144, that Plaintiff be granted leave to file a Second Amended Complaint (“SAC”) and Defendants should have twenty-one (21) days to file their responsive pleadings to that amended complaint.

The responsive pleading deadline was previously extended three times by stipulation, to allow additional time for service of individual defendant Claudio Rubio (Dkt. 4), after Rubio was served, so that responsive pleadings for all defendants would be due on the same date and to

1 allow additional time for discussion between the parties regarding further handling of the matter
2 (Dkt. 6), and so that Plaintiff may file a First Amended Complaint (Dkt. 10).

3 The parties have since met and conferred on issues Defendants intend to raise in a motion
4 to dismiss, and Plaintiff has indicated an intent to file a SAC to attempt to address those issues.
5 Plaintiff's proposed SAC is attached hereto as Exhibit A. The parties therefore believe and
6 respectfully submit that good cause exists to extend the responsive pleading deadline to allow
7 time for the filing of the further amended complaint and to allow Defendants twenty-one (21)
8 days to file their responsive pleadings so that further meet and confer efforts can be undertaken,
9 if necessary.

10
11 **IT IS SO STIPULATED AND REQUESTED.**

12 Dated: April 19, 2022

JOHNSON SCHACHTER & LEWIS
A Professional Law Corporation

13
14 By: /s/ Kellie M. Murphy
15 KELLIE M. MURPHY
16 MARIA E. MINNEY
Attorneys for Defendant
HUMANITY FOR HORSES

17 Dated: April 19, 2022

WEST COAST EMPLOYMENT LAWYERS,
APLC

19 By: /s/ Crystal F. Mohsin (as auth. on 4/19/22)
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ORDER

Pursuant to the stipulation of the parties, and finding good cause, IT IS HEREBY ORDERED that Plaintiff is granted leave to file a further amended complaint and Defendants shall have twenty-one (21) days from the date of such filing to file their responsive pleadings.

IT IS SO ORDERED.

Dated: April 20, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE